

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CRIMINAL NO: 4:24-CR-543-2
	§	
JOHN SBLENDORIO	§	

MOTION FOR DISCOVERY

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now the Defendant, JOHN SBLENDORIO, in the above styled and numbered cause, by and through his Attorney, Anthony P. Troiani and files this Motion for Discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure.

1. Defendant requests the Court order the Government to allow Defendant to inspect, copy or photograph any relevant written or recorded statements made by the Defendant, or copies thereof, within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known, to the attorney for the government; the substance of any oral statement which the government intends to offer in evidence at the trial made by the Defendant to any government agent, and or any private individual acting as a government agent.

2. Defendant requests the government furnish a copy of his prior criminal record, as well as copies of any prior criminal records of any witnesses after they have testified at trial.

3. Defendant requests the Government allow the Defendant to inspect, copy or photograph any papers, documents, photographs, tangible objects, buildings, or places, which are within the possession custody or control of the government, and which are material to the preparation for trial.

4. Defendant requests the Government allow the Defendant to inspect and copy or photograph any results or reports of physical or mental examinations, and of scientific tests or experiments, or copies thereof, which are within the possession, custody or control of the government, the existence of which is known, to the attorney for the Government.

5. Defendant request copies of any tapes/conversations/transcripts that were recorded on JOHN SBLENDORIO.

WHEREFORE PREMISES CONSIDERED, Defendant would pray this Honorable Court grant Defendant's Motion for Discovery.

Respectfully submitted,

By: /s/ Anthony P. Troiani
Anthony P. Troiani
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Attorney for Defendant
JOHN SBLENDORIO

CERTIFICATE OF SERVICE

I, Anthony P Troiani, Attorney for Defendant, JOHN SBLENDORIO, hereby certify that a true and correct copy of said Motion for Discovery has been served on to Hon. Byron Black, Assistant United States Attorney at 1000 Louisiana, Suite 2300, Houston, Texas 77002 on this the 8th day of November 2024.

/s/ Anthony P. Troiani

Anthony P. Troiani

CERTIFICATE OF CONFERENCE

Counsel conferred with the Government on November 7, 2024, and the Government is opposed to the filing of this motion.

/s/ Anthony P. Troiani

Anthony P. Troiani